

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:
CORNELIOUS WILLIAMS

Case No. 19-02841
Chapter 13
Judge Pamela S. Hollis

Debtor.

Confirmation hearing:
05/03/2019 11:30 a.m.

**TALL PINES AT GRANDE PARK ATTACHED HOME OWNERS ASSOCIATION'S
OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN
FILED FEBRUARY 4, 2019**

Now comes a certain Creditor, TALL PINES AT GRANDE PARK ATTACHED HOME OWNERS ASSOCIATION, by and through its attorney, Benjamin J. Rooney of Keay & Costello, P.C., and for its objection to Debtor's chapter 13 plan filed February 4, 2019 states as follows:

1. TALL PINES AT GRANDE PARK ATTACHED HOME OWNERS ASSOCIATION (hereinafter referred to as "TALL PINES"), is a claimant-creditor of the Debtor and brings this motion pursuant to 11 U.S.C. 1324 and 1325.

2. On February 21, 2019, TALL PINES filed its proof of claim with respect to Debtor's obligation to pay association assessments for the property located at 12913 White Pine Way, Plainfield, Illinois 60585. (Exhibit "A").

3. That pursuant to TALL PINES's governing documents, which have been recorded with the Recorder of Deeds of Kendall County, Illinois, a lien attaches to the property of the Debtor to secure unpaid assessments and other obligations arising out of ownership of a unit under the jurisdiction of TALL PINES.

4. At the time Debtor filed the chapter 13 petition on February 4, 2019, Debtor owed the amount of \$1,169.00 for past due assessments, late fees and attorney fees to TALL PINES. (Exhibit "A").

5. Debtor's plan fails to fully and properly account for TALL PINES secured interest in the subject real estate and the pre-petition arrearage.

6. As a result of TALL PINES' lien rights in Debtor's real estate and the proof of claim filed on February 21, 2019, TALL PINES, should be included in Debtor's chapter 13 plan as a secured creditor in the amount of \$1,169.00.

7. As a result of Debtor's failure to fully account for the pre-petition secured debt owed to TALL PINES, confirmation of Debtor's February 4, 2019 plan should be denied.

WHEREFORE, TALL PINES prays this court for entry of the attached order denying confirmation of the Debtor's plan filed February 4, 2019, and for any such other and further relief as this court deems just and equitable within the premises.

TALL PINES AT GRANDE PARK
ATTACHED HOME OWNERS
ASSOCIATION

By:


Benjamin J. Rooney

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